

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

DONNA POPLAR,

Plaintiff,

v

CASE NO: 2:21-cv-12568-VAR-JJCG

HON. VICTORIA A. ROBERTS

GENESEE COUNTY ROAD
COMMISSION and FRED F. PEIVANDI, in
his individual Capacity,

Defendants.

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DEFENDANTS' EXPERT WITNESS LIST

NOW COME Defendants, GENESEE COUNTY ROAD COMMISSION and FRED F. PEIVANDI, by and through their legal counsel, Henn Lesperance PLC, who each hereby submit and provide the following Expert Witness List. The List is offered in compliance with the February 8, 2022, Joint Discovery/Case Management Plan Under Rule 26(f) Federal Rules of Civil Procedure.

By and through submission of the Expert Witness List, Defendants do not waive their rights to amend the list to include additional witnesses.

WITNESS LIST

1. Any certified examiner who has conducted a physical or mental condition evaluation of Plaintiff pursuant to an Order issued by the Court following a Motion for Physical and Mental Examination of Plaintiff as filed by Defendants pursuant to Fed. R. Civ. P. 35(a)(2).
2. All necessary rebuttal expert witnesses.
3. All expert witnesses identified by Plaintiff or any other party, whether such witness is called by that other party or not.
4. All individuals identified by any party in any answer to interrogatories, disclosures to requests for production of documents, depositions, or other forms of discovery.
5. Any of Plaintiff's current or former professionals who have evaluated Plaintiff's physical or mental condition in the past whose identity becomes known throughout further discovery.
6. Any witnesses called solely for the purposes of impeachment of any other witness.

Defendants reserve the right to name and call additional witnesses as their identities become known through further investigation or through the process of formal discovery, and further reserve the right to amend this disclosure as necessary upon reasonable notice to other parties.

Dated: May 31, 2022

/s/ Andrew A. Cascini
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